

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: ETHICON WAVE 12 CASES LISTED IN PLAINTIFFS' MOTION AT EXHIBIT A (DOC. 8728)	WAVE 12

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR RESPONSES IN WAVES 6 AND
11 FOR DEFENSE EXPERT LAWRENCE LIND, M.D. (WAVE 12)**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Lawrence Lind, M.D., in the Wave 12 cases identified in Exhibit A to their Notice. *See* Doc. 8728. In response, Defendants hereby adopt and incorporate by reference the *Daubert* responses filed in relation to the general causation opinions of Dr. Lind for Ethicon in Wave 6 (Doc. 4945) (as to Prolift and Gynemesh PS products) as well as Wave 11 (Doc. 8654) (as to TVT products) as their responses for Wave 12. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in these responses.

Respectfully submitted,

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Counsel for Defendants Ethicon, Inc.,
and Johnson & Johnson

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

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